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6 *Attorneys for Plaintiff*

7 UNITED STATES DISTRICT COURT

8 DISTRICT OF NEVADA

9 FEDERICO GARIBALDI, an individual,

Case No. 2:21-cv-01444-GMN-DJA

10 Plaintiff,

11 vs.

12 BOYD GAMING CORPORATION, a Nevada
corporation; DOES I through X, inclusive; and
13 ROE BUSINESS ENTITIES, I through X,
inclusive,

14 Defendant.
**JOINT REQUEST STIPULATION AND
[PROPOSED] ORDER TO CONTINUE
DATE OF EARLY NEUTRAL
EVALUATION SESSION**

[First Request]

16 Plaintiff Federico Garibaldi (“Plaintiff”) and Defendant Boyd Gaming Corporation
17 (“Defendant”) (“Parties”), by and through their respective undersigned counsel, submit the
18 following Joint Request and [Proposed] Order to Continue the January 12, 2022 Early Neutral
19 Evaluation (“ENE”) [ECF No. 9] request as follows:

20 1. On August 31, 2021, the Court scheduled the ENE for December 10, 2021 and
21 further set the deadline to submit Confidential ENE Statements for December 3, 2021. [ECF No.
22 9].

23 2. Due to a conflict in the Court’s calendar, on November 17, 2021, the Court filed
24 an Order Scheduling Early Neutral Evaluation Session (“Order”) for January 12, 2022 and
25 further set the deadline to submit Confidential ENE Statements for January 5, 2022. [ECF No.
26 17].

27 3. On January 5, 2021, the parties each submitted their Confidential ENE Statements
28 to the Court.

1 4. Plaintiff just informed his counsel that he has accepted a job after a long and
2 arduous three-year search for replacement employment. Unfortunately, Plaintiff's new job starts
3 on Tuesday, January 11, 2022, and he has been unable to secure time off for the ENE currently
4 scheduled for January 12, 2022.

5 5. Therefore, the Parties respectfully request the ENE Session be continued for thirty
6 (30) days such that Plaintiff can establish his new employment and request time off to attend the
7 ENE Session.

8 6. The Parties and their client representatives are available on February 28, 2022.

9 7. The Parties hereby request that the Court continue the January 12, 2022 ENE for
10 February 28, 2022.

11 8. This Joint Request and Proposed Order is sought in good faith and not for the
12 purposes of delay.

13 9. This is the first request to continue the ENE.

14 **IT IS SO STIPULATED.**

15 Dated this 6th day of January 2022.

16 **H1 LAW GROUP**

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22 *Attorneys for Plaintiff*

15 Dated this 6th day of January 2022.

16 **KAMER ZUCKER ABBOTT**

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22 *Attorneys for Defendant*

24 **ORDER**

25 IT IS ORDERED that ECF No. 18 is GRANTED. The Settlement Conference is
26 rescheduled to 2/28/2022 at 9:00 a.m. IT IS FURTHER ORDERED that the pre-ENE
27 Telephonic Conference set for 1/11/2022 is hereby VACATED and will not be
rescheduled.

28 **IT IS SO ORDERED**
DATED: 1:09 pm, January 07, 2022


BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE